IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

ING BANK N.V.,	§	
	§	
Plaintiff,	§	
	§	§
v.	§	
	§	C.A. NO. 4:15-cy-00479
M/V ASTRO SATURN, IMO No.	§	ADMIRALTY
9235725, her engines, tackle, equipment,	§	ADMIRABIT
furniture, appurtenances, etc., in rem,	§	
and SATURN SPECIAL MARITIME	§	
ENTERPRISES (ENE), in personam,	§	
	§	
Defendants	§	

STATEMENT OF RIGHT OR INTEREST

COMES NOW Claimant, Saturn Special Maritime Enterprises (ENE) for the interest of itself, as the Owner of the M/V ASTRO SATURN, her engines, tackle, etc., before this Honorable Court, and makes this claim to said Vessel under Rule E(8) of the Supplemental Rules for Certain Admiralty and Maritime Claims of the Federal Rules of Civil Procedure, and said Claimant avers that as of the time of the incident set forth herein, it was the true and bona fide Owner of the M/V ASTRO SATURN, her engines, tackle, etc., and the owner of certain goods and chattels thereon; and wherefore prays to defend accordingly.

Respectfully submitted,

William A. Durham State Bar No. 06281800 S.D.TX. Adm. ID No. 4172 808 Travis, Suite 1300

Houston, TX 77002

(713) 225-0905 - Telephone

(713) 225-2907 – Fax

Attorneys for Claimant, Saturn Special Maritime Enterprises (ENE)

OF COUNSEL:

EASTHAM, WATSON, DALE & FORNEY, L.L.P.

22673: 5PCLH2145.WAD

VERIFICATION

THE STATE OF TEXAS

8

COUNTY OF HARRIS

8 §

BEFORE ME, on this day, came William A. Durham, who, stated as follows:

My name is William A. Durham and I am a member of the firm of EASTHAM, WATSON, DALE & FORNEY, L.L.P. and after being duly sworn deposed and said:

I am the attorney for Saturn Special Maritime Enterprises (ENE). The facts set forth in the Statement of Right or Interest are true and correct based upon information provided to me as attorney for Saturn Special Maritime Enterprises (ENE). The reason this affidavit is made by the undersigned is that he is the attorney for Saturn Special Maritime Enterprises (ENE), which is a corporation that does not have officers or directors within the district.

William A. Durham

SWORN AND SUBSCRIBED TO BEFORE ME this 26 day of February, 2015.

CAROL HENDRICKS

Notary Public

STATE OF TEXAS

My Comm Exp. Mar. 31.2018

Notary Public, State of Texas

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I forwarded a true and correct copy of the foregoing instrument to the following counsel of record on this the 26th day of February, 2015.

Joseph R. Messa King, Krebs & Jurgens, P.L.L.C. 6363 Woodway, Suite 820 Houston, TX 77057

James D. Bercaw Laura E. Avery King, Krebs & Jurgens, P.L.L.C. 201 St. Charles Avenue, 45th Floor New Orleans, LA 70170

William A. Durham

3